

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING

In re)	
)	
)	
Clicked AI,)	Case No. 24-20226
)	Chapter 11
)	
Debtor.)	<u>DECLARATION OF KENNY LOK IN</u>
)	<u>SUPPORT OF EXPEDITED MOTION FOR</u>
)	<u>ENTRY OF ORDER AUTHORIZING USE</u>
)	<u>OF CASH COLLATERAL</u>
_____)	

I, Kenny Lok, hereby declare as follows:

1. I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently thereto.

2. I am the President of Clicked AI, a Wyoming corporation (the “Company”). The Company is in the business of purchasing and reselling retail goods in bulk.

3. The Company is a going concern with average monthly revenue of approximately \$270,000.00 per month. It has sixteen contractors that perform administrative and day to day functions for the Company. Paying these contractors is necessary for the company to continue operations. The Company also has ordinary operating expenses for the purchase of new inventory, for rent for its office and other customary expenses. The Company proposes to use its cash to pay ordinary business expenses.

4. Currently, the Company is unable to pay its liabilities as they become due. If the amount of secured debt were reduced commensurate with the value of the Company’s assets, then the Company would be viable going forward.

5. There are certain secured creditors with an interest in the Company's cash collateral, They are (1) Amazon Capital Services, Inc. dba Amazon Lending; (2) Syndimate 2017 LP; (3) Celtic Bank dba Kabbage; and (4) Parafin Inc. These creditors have security interests in the Company's accounts receivables and/or inventory.

6. After the filing of Clicked AI's chapter 11 petition on June 13, 2024, creditor Amazon Capital Services, Inc, doing business as Amazon Lending, froze Clicked AI's Amazon seller account ("Seller Account"), which is administered by Amazon Services LLC or an affiliate of Amazon.com, Inc. Specifically, on the Amazon web portal for Clicked AI, there is a notation that Amazon is holding \$74,664.55 of Clicked AI's money in an "Account Level Reserve." *See Exhibit A.*

7. According to the June 16, 2024 web portal report, Clicked AI had a "beginning balance" of a positive \$68,052.63, plus additional sales proceeds of \$20,898.63, which represents money that Clicked AI has earned through its sales since June 13, 2024 but which is still in Amazon's possession and which has not been remitted to Clicked AI. After deducting for certain expenses (\$13,387.59) and refunds (\$909.02), the web portal for Clicked AI with Amazon should reflect net proceeds of \$74,664.55, but instead reflects "net proceeds" of zero, with Amazon holding the \$74,664.55 in an "Account Level Reserve." *See Exhibit A.* This action appears to be the result of Clicked AI's chapter 11 filing.

8. Virtually all of Clicked AI's sales occur on Amazon's amazon.com platform. Amazon has assigned a merchant number A3ITMN7TLDLXFM to Clicked AI.

9. If Amazon Services LLC, Amazon.com, Inc. and Amazon Capital Services Inc. doing business as Amazon Lending are allowed to continue withholding Clicked AI's earned revenue, then Clicked AI will quickly be forced to cease operations. The funds that Amazon is holding are crucial for Clicked AI to pay for its day-to-day operations and to purchase replacement inventory.

10. In order for the Company to continue as a going concern and to propose a feasible chapter 11 plan, it is imperative that the Company be allowed both to use the proceeds from its sales to purchase new inventory and that it be allowed to sell its existing inventory in the ordinary course of business. Allowing the use of cash collateral now will be in the best interest of creditors, who stand to receive more from a successful reorganization than from liquidation of the Company.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I executed this declaration on June 18, 2024.

____/s/ Kenny Lok _____

President
Clicked AI